



U.S. Department  
of Transportation  
  
Research and  
Special Programs  
Administration

400 Seventh Street, S.W.  
Washington, D.C. 20590

SEP - 1 1998

Mr. Anthony P. Wilson  
Senior Logistics Supply Administrator  
Mail Stop G-401  
Toyota Motor Sales, U.S.A., Inc.  
19001 South Western Avenue  
Torrance, California 90509-2991

Ref. No. 98-0235

Dear Mr. Wilson:

This responds to your letter of August 10, 1998, concerning labeling requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if labels on shipments of auto parts you received from Japan comply with the HMR with regard to the text in English and Japanese and the background color.

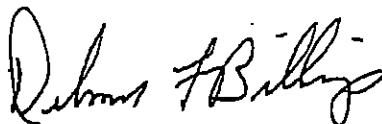
Text on a label that indicates a hazard is not required by the HMR. However, it is permissible to include such text. Labels conforming to specifications in the UN Recommendations on the Transport of Dangerous Goods may be used in place of the corresponding label under the HMR (see § 172.407(f)). These labels may contain text indicating the hazard in the language of the country from which a shipment originates.

Colors authorized for UN labels can be found in Chapter 13 of the Tenth Edition of the UN Recommendations (see section 13.5.1). While the UN Recommendations are not as specific as the HMR concerning color tolerances for labels, they do include color pictures for each label authorized for international transportation. Shippers should compare actual labels with the pictures in section 13.5.1 to ascertain whether specific labels comply with the UN Recommendations. With your letter, you enclosed two examples of the labels used by your Japanese shipper. It is the opinion of this office that the olive-green

label is not consistent with the color specification in the UN Recommendations; however, the darker green label does appear to comply with the UN standard.

I hope this satisfies your request. If you need additional assistance, do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Delmer F. Billings".

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards

# LABELS, MARKS AND SIGNS

For each of Class 1 in division 1.4, subsidiary group 5, each storage may alternatively be marked 1.4.5

**1** Labels of class 1

The appropriate division number and compatibility group are to be placed in the position for divisions 1.1, 1.2 and 1.3, e.g. 1.1 D

The appropriate compatibility group is to be placed in the location, e.g. D

The appropriate compatibility group is to be placed in the location, e.g. H

Subsidiary risk label of class 1.2

**2** Labels of class 2

Class 2.1

Class 2.2

Class 2.3

**MARINE POLLUTANT Mark**

**3** Label of class 3

**ELEVATED TEMPERATURE Mark**

**4** Labels of class 4

Class 4.1

Class 4.2

Class 4.3

**FUMIGATION WARNING Sign**

**5** Labels of class 5

Class 5.1

Class 5.2

**6** Labels of class 6

Class 6.1

Class 6.2

**7** Labels of class 7

Category I

Category II

Category III

**8** Label of class 8

**9** Label of class 9

**Subsidiary risk labels**

Subsidiary risk labels are as shown here, but they should not bear the class number in the bottom corner. For example:

For further information, see section B of the General Introduction to the IMDG Code.